

EXHIBIT 17

Janitens, Erik

From: Janitens, Erik
Sent: Monday, September 10, 2018 1:02 PM
To: 'William Ramey'; Greeson, Robert
Cc: Victoria Kubitskey; Harry Laxton; Joby Hughes
Subject: RE: WPEM, LLC v. SOTI Inc. - FRE 408 Communication

Bill –

The letter and attachments demonstrate that the technical details WPEM relies on in its infringement contentions (i.e., certain SOTI MobiControl Manual Version 14 pages) were disclosed prior to the patent priority date. For each Version 14 manual page relied on to allege infringement, we've provided an identical page from the Version 10 manual showing the same functionality. To the extent you think the Version 14 manual demonstrates infringement, the claims are necessarily invalidated by the Version 10 manual that predates the patent. If you think this is insufficient to demonstrate that the functionality existed prior to the date of the patent, please let us know. If you prefer, we can set up a call.

Thanks,
Erik

From: William Ramey [mailto:wramey@rameyfirm.com]
Sent: Thursday, September 6, 2018 8:19 PM
To: Janitens, Erik <erik.janitens@nortonrosefulbright.com>; Greeson, Robert <robert.greeson@nortonrosefulbright.com>
Cc: Victoria Kubitskey <vkubitskey@rameyfirm.com>; Harry Laxton <hlaxton@rameyfirm.com>; Joby Hughes <jhughes@rameyfirm.com>
Subject: RE: WPEM, LLC v. SOTI Inc. - FRE 408 Communication

Erik,

We cannot see a working device. I do not see a working embodiment? Am I missing something? I see very general statements.

That being said, we will keep discussing these issues with you. When can we meet and discuss?

Bill

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From: Janitens, Erik <erik.janitens@nortonrosefulbright.com>

Sent: Thursday, September 06, 2018 5:47 PM

To: William Ramey <wramey@rameyfirm.com>; Greeson, Robert <robert.greeson@nortonrosefulbright.com>

Subject: RE: WPEM, LLC v. SOTI Inc. - FRE 408 Communication

Bill –

Following up with this—do you have a response?

Thanks,

Erik

From: Janitens, Erik

Sent: Monday, August 27, 2018 3:57 PM

To: 'William Ramey' <wramey@rameyfirm.com>; Greeson, Robert <robert.greeson@nortonrosefulbright.com>

Subject: RE: WPEM, LLC v. SOTI Inc. - FRE 408 Communication

Bill –

Documents 10/11 demonstrate MobiControl v10 (w/ speed lockdown functionality shown in documents 1-9) was publicly available in January 2013.

Thanks,

Erik

From: William Ramey [<mailto:wramey@rameyfirm.com>]

Sent: Monday, August 27, 2018 2:04 PM

To: Greeson, Robert <robert.greeson@nortonrosefulbright.com>

Cc: Janitens, Erik <erik.janitens@nortonrosefulbright.com>

Subject: Re: WPEM, LLC v. SOTI Inc. - FRE 408 Communication

Are the dates apparently from the documents?

We will review and get back with you.

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From: Greeson, Robert <robert.greeson@nortonrosefulbright.com>
Sent: Monday, August 27, 2018 11:34 AM
To: William Ramey
Cc: Janitens, Erik
Subject: WPEM, LLC v. SOTI Inc. - FRE 408 Communication

Bill –

Further to our prior discussions, the attached letter and accompanying documents demonstrate the Accused Technology was in use and publicly-available before the priority date of the Asserted Patent.

I look forward to your response.

Best,

--rg

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